Training and Evaluations for OQ Where Things Can Go Wrong

2018 Pipeline Safety Conference

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Agenda

Brief OQ History

Training

Evaluators

Program Effectiveness Review

1994 – NPRM for Training: Industry said No

1994 – NPRM for Training: Industry said <u>No</u> Negotiated Rulemaking (1999) – First and Last

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Training in NPRM

Training Requirements

The NPRM proposes training requirements for individuals performing covered tasks:

- Training to ensure individual has necessary KSA's to perform
- Provide supplemental training when procedures or specifications change

Industry is all over the board on training:

Some operators and contractors spend as little time training personnel as possible

Some operators and contractors have thorough initial training and little follow-up

A smaller portion of operators and contractors have a thorough initial training program and continuous follow-up

Understand that each of these scenarios may be working for each. The first two though, will eventually quit working.

#1 - Some operators and contractors spend as little time training personnel as possible.

If they are able to retain talented employees and new hires have previous experience, things may go well.

Until retirement or better money take those individuals away. Two words – Succession planning...

If training is non-existent or rushed, higher evaluation failure rates have occurred (more resources)

#2 - Some operators and contractors have thorough initial training and little follow-up:

This scenario gets personnel evaluated and boots on the ground. Some companies are providing all updates and training in a short briefing, at a jobsite. The opportunity to "learn and practice" is not provided

With changes to procedures and equipment, it is important that employees have confidence to in their ability to perform the covered tasks they are responsible for

How you prepare and address upcoming training is more important than how you conduct training......

If you advertise training as a negative issue, "Hey, we have to do this so just be there", you have just put up one roadblock for someone to get something out of the training. Whether it is first time or a repeat, someone may learn one important thing that saves themselves or someone else.

If you develop the training, it is important to make it interesting and not presented to the attendees as talking down to them.

A real issue is the multi-generations that we now have in the workforce. An effort to make the training relevant to your whole audience is a challenge.

Do you have requirements for trainers?

What characteristics do you want for a trainer?

Do you have requirements for trainers?

- Qualified to perform the same tasks training on
- Subject Matter Expert
- Authorized trainer through standard training program
- Time (5 years?) in the category (corrosion, pressure)
- Supervisor or higher

What characteristics do you want for a trainer?

- Able to explain a procedure
- Eliminate confusion
- Readily answer questions
- Patient
- Consistent

Evaluation in the NPRM

Requirements for Evaluators

The NPRM proposes adding a <u>new</u> requirement for evaluators of individuals performing covered tasks:

- Establish the requirements to be an Evaluator,
- Including the necessary training

Evaluators

What requirements do you think an authorized evaluator should have to evaluate individuals performing covered tasks?

These are individuals that would be performing covered tasks by themselves in many instances for some operators and contractors.....

Evaluators

Evaluator requirements:

- Qualified to perform the same tasks evaluating on
- Subject Matter Expert
- Authorized evaluator through standard training
- Time (5 years?) in the category (corrosion, pressure)
- Supervisor or higher

Evaluators

Evaluator requirements (continued):

- Not Supervisors due to possible conflicts
- Trainer could evaluate (needs to separate activities)
- Third-party evaluators
- Consistent and fair

Evaluations

- Can your evaluators make the statement that each individual they have evaluated has the knowledge, skills and ability to perform each covered task?
- Would they make that statement in a court of law?
- Does your process include documentation of all aspects of the evaluation?

Examples

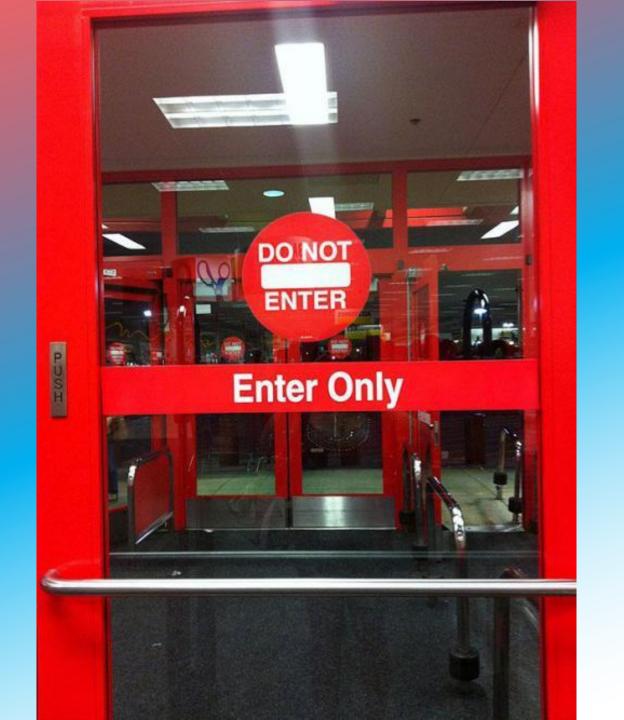
Just some graphics for consideration – Were they trained? What kind of training? Effective?

Would they have been evaluated to do this work?



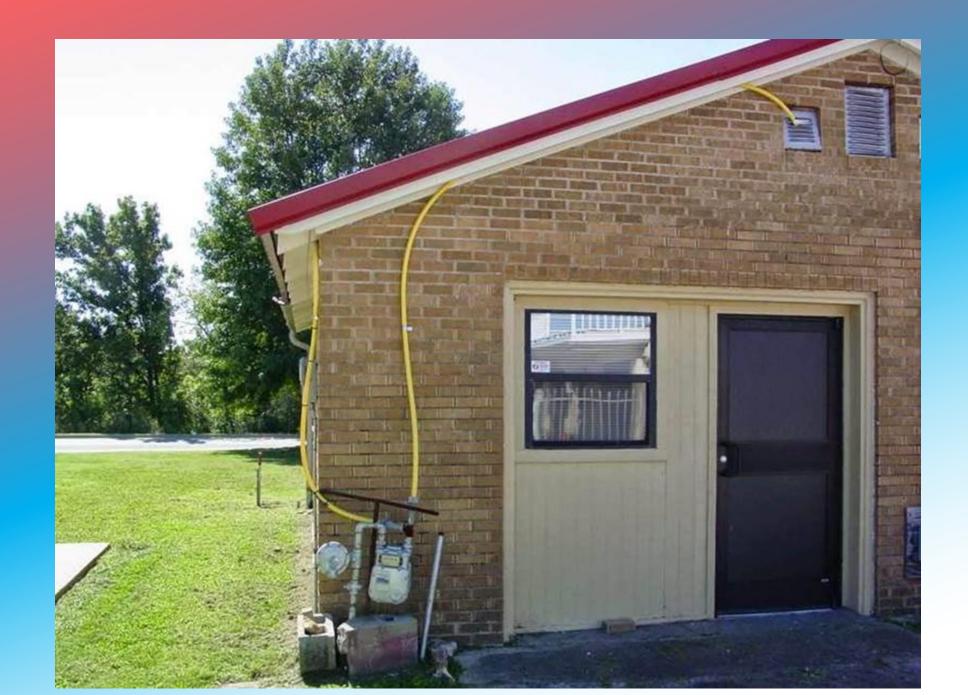
















Program Effectiveness Review

Program

How do you know your training and evaluation programs are effective?

- Have you looked at data to see of the program is having fewer failures in written and performance evaluations?
- What about the field? Have your near misses or incidents and accidents increased or decreased?

Program

Have you reviewed the training your personnel are receiving? Is it relevant to your program?

Have you assessed your evaluators? Are they consistent and fair? Do the evaluations measure the knowledge, skills and abilities of the personnel performing the covered tasks?

The NPRM proposes adding a <u>new</u> requirement for a written process to measure the OQ program's effectiveness which must be reviewed each calendar year, NTE 15 months

- Evaluate to determine the program is being implemented and executed as written
- Develop MOC to address the findings of review

Measures will need to be developed to determine the program effectiveness

PHMSA requires the measurement addressing the number of occurrences caused by an individual performing covered task(s) that adversely affected the safety or integrity of the pipeline due to any of the following:

Evaluation not conducted properly

KSAs not adequately determined

Training not adequate

Changes made to a CT or KSAs not adequately evaluated

Changes were not adequately communicated

Individual failed to recognize AOCs – either type

Individual failed to react correctly to an AOC – either type

Individual was not qualified

Nonqualified individual was not directed and observed by a qualified individual

Individual did not follow approved procedures and/or use approved equipment

Span of control not followed

Evaluator or training did not follow or meet requirements

The qualified individual supervised more than one covered task at a time

You will need at least one more metric for program effectiveness.

Who will be responsible for carrying out this assessment of your OQ program?

What will be your process to address areas of improvement determined in the assessment?

Closing

If you have not already made them, decisions need to be made to address:

- Training and trainers
- Evaluations and evaluators
- Program effectiveness

QUESTIONS?

THANK YOU...

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